

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>IN RE: ZIMMER NEXGEN KNEE</b>	)	
<b>IMPLANT PRODUCTS LIABILITY</b>	)	<b>MDL NO. 2272</b>
<b>LITIGATION</b>	)	
	)	<b>Master Docket Case No.: 1:11-cv-05468</b>
	)	<b>ALL CASES</b>
This Document Relates to All Cases	)	
	)	<b>JUDGE REBECCA PALLMEYER</b>

**NOTICE OF MOTION**

PLEASE BE ADVISED that on **Thursday November 10, 2011 at 8:45 a.m.**, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Rebecca Pallmeyer in Courtroom 2119 of the U.S. District Court for the Northern District of Illinois, Dirksen Building, 219 South Dearborn, Chicago, Illinois and then and there present:

**PLAINTIFFS' MOTION TO COMPEL MORE COMPLETE DISCLOSURE FROM  
ZIMMER AND THE OTHER DEFENDANTS**

Dated: November 4, 2011

RESPECTFULLY SUBMITTED,

/s/ Peter J. Flowers \_\_\_\_\_  
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***ATTORNEYS FOR PLAINTIFFS***

**CERTIFICATE OF SERVICE**

I hereby certify that on November 4, 2011, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, using the electronic case filing system of the Court.

/s/ Peter J. Flowers\_\_\_\_\_